

JAN 27 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In re:

Redevelopment of Spectrum to  
Encourage Innovation in the  
Use of New Telecommunications  
Technologies

ET Docket No. 92-9

RM-7981

RM-8004

Reply of Hughes Communications Galaxy, Inc.

Hughes Communications Galaxy, Inc. ("HCG") hereby replies to the Comments filed on the Commission's Further Notice of Proposed Rulemaking, released September 4, 1992, in this proceeding.

In its Comments, HCG expressed concern that the proposed rechannelization of the 4 GHz band would unduly disrupt many existing satellite services because it would result in increased terrestrial interference that would be difficult if not impossible to eliminate.

HCG's concerns have been echoed by other segments of the satellite industry, as well as by portions of the microwave industry. The terrestrial interference problems that the proposed rechannelization will create for satellite operators, satellite programmers, cable headends, home dish users, the public radio network, and others, are thoughtfully set forth in the Comments of National Public Radio, Home Box Office, GTE Service Corporation, and the Satellite Broadcasting and Communications Association. The satellite industry is not alone

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in its concerns. Similar concerns about introducing new, narrowband channels into the already congested 4 GHz band have been expressed by each of the following participants in the microwave industry: the National Spectrum Managers Association, the Telecommunications Industry Association, Northern Telecom, Harris Corporation-Farion Division, Digital Microwave Corporation, Telesciences, Inc. and Comsearch.

The Commission's rechannelization proposal for the 4 GHz band poses a very real threat of disrupting satellite services. No party has yet set forth a plan that allows narrowband terrestrial channels to be integrated into the existing wideband 4 GHz channelization scheme, without creating this interference problem.

HCG again emphasizes that it does not object to sharing the 4 GHz band with displaced microwave users in a manner that is harmonious with the existing channelization of that band. However, HCG urges the Commission to consider whether the needs of displaced microwave users can be met by allowing them to operate solely on 20 or 40 MHz channels in the 4 GHz band, and on smaller channels in other frequency bands.

Respectfully submitted,

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January 27, 1992

**CERTIFICATE OF SERVICE**

I, John P. Janka, do hereby certify that the attached Reply Comments of Hughes Communications, Inc. was mailed, postage prepaid, this 27th day of January, 1993, to the following:

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